

EXHIBIT E

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5 Attorneys for Plaintiffs,
6 TARA ANN BARTOLI, BRETT THOMAS
BARTOLI, TARA ANN BARTOLI as Guardian
7 ad litem for M.B., and TARA ANN BARTOLI as
Guardian ad litem for L.B.

8
9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 TARA ANN BARTOLI, an individual; BRETT
THOMAS BARTOLI, an individual, TARA
12 ANN BARTOLI as Guardian ad litem for
M.B., and TARA ANN BARTOLI as Guardian
13 ad litem for L.B.

14 Plaintiffs,

15 v.

16 RANCHO CALIFORNIA RV RESORT
OWNERS ASSOCIATION, a California
17 nonprofit mutual benefit corporation; DESERT
RESORT MANAGEMENT, INC., a California
18 corporation; CARI BURLEIGH, an individual;
CANDICE ELAINE WILLIAMS, an
19 individual doing business as FAIRWAY
ASSOCIATES; KIMBERLY LYNN BACA,
20 an individual doing business as FAIRWAY
ASSOCIATES; and, DOES 1 through 10,
21 inclusive,

22 Defendants.
23
24

Case No. 5:18-CV-02643-MWF-KK

**PLAINTIFFS' REQUEST FOR
PRODUCTION OF DOCUMENTS AND
THINGS TO DEFENDANT CANDICE
ELAINE WILLIAMS, SET ONE**

Time/Place for Inspection:

Date: September 9, 2019

Time: 10:00 a.m.

Place: Dapeer, Rosenblit & Litvak, LLP
11500 West Olympic Blvd.
Suite 550
Los Angeles, CA 90064

25 **PROPOUNDING PARTY:** Plaintiffs TARA BARTOLI, et al.

26 **RESPONDING PARTY:** Defendants, CANDICE ELAINE WILLIAMS

27 **SET NUMBER:** ONE (1)
28

12. Identify and produce all segregable portions of any responsive document to which a claim of privilege, attorney work product, or other basis for withholding the document does not apply.

13. These Requests for Production of Documents are continuing in character so as to require you to promptly amend or supplement your response if you discover or obtain further materials in accordance with FRCP 26(e).

14. If any document requested herein has been lost, discarded, or destroyed, please furnish a list identifying each such document as completely as possible including, without limitation, the following information: its author and addressee, each person to whom copies of the document were furnished or to whom the contents thereof were communicated, a comprehensive summary of the substance of the document, the date (or approximate date) of its disposal, the manner of its disposal, the reason for its disposal, the person authorizing its disposal, and the person disposing of the document.

DEFINITIONS

1. As used herein, the term "Answer" shall mean and refer to Answer you filed in this action in response to the Complaint.

2. As used herein, the term "Complaint" shall mean and refer to the Complaint filed in this action.

3. As used herein, the terms "concerning," "relating to," "reflecting," or "regarding" shall mean and refer to involving, pertaining to, constituting, comprising, containing, setting forth, showing, disclosing, describing, explaining, evidencing, summarizing, or bearing upon.

4. As used herein, the term "document" shall include all matters defined by Rule 1001 of the Federal Rules of Evidence.

5. As used herein, the term "DRM" shall mean and refer to Desert Resort Management, Inc., including its owners, officers, directors, members, managers, employees, staff, agents, and any and all other persons acting or purporting to act on its behalf or in concert with it, including but not limited to Cari Burleigh.

6. As used herein, the term "familial status" shall mean and refer to the status of being a pregnant woman, or an individual who is in the process of securing legal custody of an individual under 18, or a parent or person having legal custody, or the designee of a parent of person having legal

1 custody, of one or more individuals who are under 18 years of age and domiciled with that parent,
2 person or designee.

3 7. As used herein, the term "HOA" shall mean and refer to the Rancho California RV
4 Resort Owners Association, including its boards, members, managers, employees, staff, agents, and
5 any and all other persons acting or purporting to act on its behalf or in concert with it.

6 8. As used herein, the term "person" includes both singular and plural, and refers to any
7 natural person, firm, association, partnership, joint venture, corporation or any other group or
8 combination acting as a unit or other entity, and the agents, servants, employees and representatives
9 thereof.

10 9. As used herein, the terms "policy" and "policies" shall mean and refer to both written or
11 formal rules, as well as practices of general applicability that may not have been reduced to writing or
12 otherwise formalized.

13 10. As used herein, the term "Rule" shall mean and refer to the rule, set forth at page
14 FAIRWAY 000004 of your Initial Disclosures in this case, that provides, "No person under 18 years of
15 age, while occupying a Unit in the resort, shall be enrolled in any school (including home schooling)."

16 11. As used herein, the term "site" shall mean and refer to any RV site and/or any and all
17 structures appurtenant thereto.

18 12. As used herein, the term "Subject Property" shall mean and refer to Rancho California
19 RV Resort, located at 45525 Highway 79 South, Aguanga, CA 92536.

20 13. As used herein, the terms "you," "your," and "yours" shall mean and refer to Candice
21 Elaine Williams, individually and doing business as Fairway Associates, and shall include any of her
22 agents, employees, partners, joint ventures, and any and all other persons acting or purporting to act on
23 her behalf or in concert with her, including but not limited to any and all agents, employees, partners,
24 members, managers, and joint ventures of Fairway Associates.

25 DOCUMENT REQUESTS

26 REQUEST NO. 1:

27 All documents you reviewed or relied on when drafting your Answer to Plaintiffs' Complaint.

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REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS (FRCP 34)

William Litvak, Esq. (SBN 90533)
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Attorneys for Plaintiffs,
 TARA ANN BARTOLI, BRETT THOMAS
 BARTOLI, TARA ANN BARTOLI as Guardian
 ad litem for M.B., and TARA ANN BARTOLI as
 Guardian ad litem for L.B.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TARA ANN BARTOLI, an individual; BRETT
 THOMAS BARTOLI, an individual, TARA
 ANN BARTOLI as Guardian ad litem for
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 ad litem for L.B.

Plaintiffs,

v.

RANCHO CALIFORNIA RV RESORT
 OWNERS ASSOCIATION, a California
 nonprofit mutual benefit corporation; DESERT
 RESORT MANAGEMENT, INC., a California
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 CANDICE ELAINE WILLIAMS, an
 individual doing business as FAIRWAY
 ASSOCIATES; KIMBERLY LYNN BACA,
 an individual doing business as FAIRWAY
 ASSOCIATES; and, DOES 1 through 10,
 inclusive,

Defendants.

Case No. 5:18-CV-02643-MWF-KK

**PLAINTIFFS' REQUEST FOR
 PRODUCTION OF DOCUMENTS AND
 THINGS TO DEFENDANT KIMBERLY
 LYNN BACA, SET ONE**

Time/Place for Inspection:

Date: September 9, 2019
 Time: 10:00 a.m.
 Place: Dapeer, Rosenblit & Litvak, LLP
 11500 West Olympic Blvd.
 Suite 550
 Los Angeles, CA 90064

PROPOUNDING PARTY: Plaintiffs TARA BARTOLI, et al.
RESPONDING PARTY: Defendants, KIMBERLY LYNN BACA
SET NUMBER: ONE (1)

REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS (FRCP 34)

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6. As used herein, the term "familial status" shall mean and refer to the status of being a pregnant woman, or an individual who is in the process of securing legal custody of an individual under 18, or a parent or person having legal custody, or the designee of a parent of person having legal

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21 Lynn Baca, individually and doing business as Fairway Associates, and shall include any of her agents,
22 employees, partners, joint ventures, and any and all other persons acting or purporting to act on her
23 behalf or in concert with her, including but not limited to any and all agents, employees, partners,
24 members, managers, and joint ventures of Fairway Associates.

25 DOCUMENT REQUESTS

26 REQUEST NO. 1:

27 All documents you reviewed or relied on when drafting your Answer to Plaintiffs' Complaint.

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